

**REMARKS**

Claims 1-5, 7, 8, 10-15, 17, 18 and 20-24 are pending in this application. By this Amendment, (1) the specification is amended to conform to drawing Figure 1, (2) drawing Figure 1 is amended to be labeled "Prior Art", (3) claim 1 is amended to recite that the metering blade assembly comprises a metering blade mounted on a mounting bracket, and that the at least one leaf spring is connected to a lateral end portion of the mounting bracket (as described in paragraph [0028] of the specification), (4) claims 5 and 15 are amended to include the recitations of claims 6 and 16, respectively, (5) claim 14 is amended to recite an additional step of securing a tab portion of the at least one leaf spring to the drum maintenance unit, (6) claim 17 is amended to correct an antecedence basis issue, (7) claims 6, 9, 16 and 19 are canceled, and (8) new dependent claims 21-24 are added.

Support for new claims 21 and 24 may be found in at least paragraphs [0028] and [0030] of the specification. Support for new claim 22 may be found in at least paragraphs [0028] and [0033] of the specification. Support for new claim 23 may be found in the specification at least at paragraph [0028].

**I. Objection to the Drawings**

Fig. 1 was objected to as allegedly requiring a legend such as "Prior Art" by this Amendment, Fig. 1 is amended to include the legend suggested by the Patent Office.

The drawings were further objected to as failing to include the reference characters "150" and "152" mentioned in the specification. By this Amendment, the specification has been amended to delete reference to these characters. Illustration of the conventional torsion springs in Fig. 1 is not required for an understanding of the presently claimed invention, and thus these reference characters are unnecessary to an understanding of the present invention.

In view of the foregoing, Applicant respectfully submits that the drawing objections have been overcome. Reconsideration and withdrawal of the objections to the drawings are respectfully requested.

**II. Rejection Under 35 U.S.C. §102(b)**

Claims 1-3 and 5-8 were rejected as allegedly being anticipated by Giard (WO 97/36747). This rejection is respectfully traversed.

As an initial matter, Applicant notes that WO 97/36747 is equivalent to U.S. Patent No. 6,109,174. Accordingly, as WO 97/36747 is in French, Applicant hereinafter refers to U.S. Patent No. 6,109,174 in discussing the teachings of Giard.

Present claim 1 recites a metering blade suspension system comprising a metering blade assembly, the metering blade assembly comprising a metering blade mounted on a mounting bracket, and at least one leaf spring connected to the metering blade assembly, the at least one leaf spring being connected to a lateral end portion of the mounting bracket. Applicant respectfully submits that Giard fails to teach or suggest such a metering blade suspension system.

Giard describes a doctor blade for a screen printing machine. The doctor blade includes a head 3, a lip 5, and at least one elastically deformable member 4 connecting the head and a lip. The doctor blade is connected to a doctor blade carrier 1 with a screw 10.

In the Office Action, it was alleged that the elastically deformable member 4 corresponded to the leaf spring recited in claim 1. Applicant strenuously disagrees.

As described in Giard, the elastically deformable member 4 is comprised of, for example, bent wires that have a certain elasticity. See, for example, col. 8, lines 22-25 of Giard. The elastically deformable members 4 in Giard are characterized as being similar to teeth of a comb. See, for example, col. 7, lines 1-3 and lines 49-57, and col. 8, lines 22-28 of Giard. Applicant respectfully submits that the elastically deformable members described to

connect the head and lip of the doctor blade in Giard are not leaf springs as in claim 1.

Applicant notes that Giard in fact nowhere uses the term leaf spring in the description of the doctor blade.

Further, even if the elastically deformable member of Giard were to somehow be characterized as a leaf spring, the invention of claim 1 still would not have been achieved. As recited in claim 1, the at least one leaf spring must be connected to a lateral end portion of the mounting bracket of the metering blade assembly. Such is not the case in the doctor blade of Giard. In Giard, the elastically deformable member connects the head 3 and lip 5 of a doctor blade so that the doctor blade has elasticity. Nowhere is it taught or suggested in Giard that the elastically deformable member is connected to a lateral end portion of a mounting bracket.

For at least the foregoing reasons, Applicant respectfully submits that Giard fails to teach, and therefore fails to anticipate, the metering blade suspension system defined by present claim 1. Reconsideration and withdrawal of this rejection are respectfully requested.

### **III. Rejection Under 35 U.S.C. §103(a)**

Claims 4 and 9-20 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Giard in view of U.S. Patent No. 5,722,022 (Park). This rejection is respectfully traversed.

Park was relied upon as allegedly teaching the use of an electrically conductive doctor blade, as well as allegedly teaching a drum maintenance unit and a removable cassette for an imaging apparatus. Applicant respectfully submits that nothing in the teachings of Park remedy the deficiencies of Giard discussed above.

Park describes the use of a doctor blade 20 that contacts a developing roller 14 so as to form an even layer of toner upon the developing roller 14. The doctor blade 20 is supported with a bracket 18. See Fig. 4, and col. 5, lines 41-67 of Park.

With respect to claim 1, like Giard discussed above, nowhere does Park teach or suggest a metering blade suspension system in which at least one leaf spring is connected to a lateral end portion of a mounting bracket of a metering blade assembly. Park thus fails to remedy the deficiencies of Giard with respect to the metering blade suspension system of present claim 1.

With respect to independent claim 14, this claim recites a method of supporting a metering blade assembly in a drum maintenance unit, comprising connecting at least one leaf spring to the metering blade assembly, and securing a tab portion of the at least one leaf spring to the drum maintenance unit. Neither Giard nor Park teach or suggest such a method of supporting a metering blade assembly in a drum maintenance unit. Specifically, nowhere do Giard or Park teach or suggest utilizing at least one leaf spring connected to a metering blade assembly to support the metering blade assembly in a drum maintenance unit by securing a tab portion of the at least one leaf spring to the drum maintenance unit.

The Patent Office relied upon Giard as allegedly suggesting this method of supporting a metering blade assembly in a drum maintenance unit. However, as discussed above, nowhere does Giard teach or suggest the use of a leaf spring at all, much less the use of a leaf spring to support a metering blade assembly in a drum maintenance unit by securing a tab portion of the at least one leaf spring to the drum maintenance unit, the leaf spring also being connected to the metering blade assembly.

For at least the foregoing reasons, Applicant respectfully submits that neither Giard nor Park, whether taken singly or in combination, teach or suggest the metering blade suspension system of claim 1, or the method of supporting a metering blade assembly in a drum maintenance unit of claim 14. Reconsideration and withdrawal of this rejection are respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-5, 7, 8, 10-15, 17, 18 and 20-24 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:

Replacement Drawing Sheet

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